



MARYLAND DEPARTMENT OF THE ENVIRONMENT

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Governor

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TO: Michelle Price-Fay, Chief
NPDES Enforcement Branch (3WP42)
EPA Region III

FROM: Sharon Talley, Chief, Enforcement Division, Compliance Program
Water Management Administration

SUBJECT: Referral for EPA enforcement review: **National Archives WWTP (WWTP), NPDES Permit # MD0065871**, National Archives and Records Administration (NARA), Permittee, located at

DATE: March 31, 2015

The Water Management Administration, Compliance Program, is directing an electronic case file for the National Archives and Records Administration's (NARA) WWTP, NPDES Permit # MD0065871/ State Discharge Permit # 09-DP-2904 for EPA's consideration regarding a possible enforcement action.

The permit has a starting effective date of December 1, 2009. The review of Discharge Monitoring Reports (DMRs) and inspections reports of the facility from 2010 to present have revealed ongoing violations of the Permit related to failure to retain the required monitoring records, failure to sample the required permit parameters and violations the Permit effluent limitations that have place the facility in significant noncompliance. Specifically, monthly average exceedances of total copper, total zinc, and total chlorine limits; and daily exceedances of pH minimum and maximum limits. In addition, sampling and monitoring did not begin until the first quarter of 2012.

Additionally, results from their Whole Effluent Toxicity (WET) test indicate chronic toxicity in the discharge to the receiving stream.

The case file includes a copy of the NPDES permit, correspondence between MDE and NARA regarding the facility's current status, DMRs and inspection reports. The contact for the NPDES discharge permit is Lawrence M. Holley, Facility Manager. Mr. Holley's contact information is as follows:

Facility Manager
National Archives & Records Administration
8601 Adelphia Road
Room 2320
College Park, MD 20740-6001